

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No.:	17-09513
)		
Pittsfield Development LLC,)	Chapter:	11
)		
Debtor.)	Honorable Judge Jacqueline P. Cox	

NOTICE OF MOTION

To: See attached service list.

PLEASE TAKE NOTICE that on **May 9, 2018 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Jacqueline P. Cox or any Judge sitting in her stead, in **Courtroom 680** of the Everett M. Dirksen Courthouse for the United States District Court for the Northern District of Illinois, Eastern Division, 219 S. Dearborn Street, Chicago, Illinois 60604, and then and there present its **MOTION TO WITHDRAW AS COUNSEL**, a true and accurate copy of which is attached hereto and hereby served upon you.

To insure notice of any action in this case, Creditor, 55 EAST WASHINGTON DEVELOPMENT LLC, an Illinois limited liability company, should retain other counsel herein or file with the clerk of the court their supplementary appearances stating an address at which service of notices or other papers may be had upon the Creditor.

Dated: April 23, 2018

/s/ Allen R. Perl

Allen R. Perl, ARDC No.: 6191920

Vlad V. Chirica, ARDC No.: 6320436

PERL & GOODSNYDER, LTD.

Attorneys for 55 East Washington Development LLC

14 North Peoria Street, Suite 2C

Chicago, Illinois 60607

(312) 243-4500

aperl@perlandgoodsnyder.com

vchirica@perlandgoodsnyder.com

CERTIFICATE OF SERVICE

TO: See attached Service List.

I, an attorney under oath, hereby certify under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, that I caused the following documents:

- (1) **Notice of Motion**
- (2) **Certificate of Service**
- (3) **Motion to Withdraw as Counsel**

to be sent to each attorney to whom directed at their respective addresses:

 X **Via the United States Bankruptcy Court for the Northern District of Illinois's CM/ECF System**, by electronically filing the same **23rd day of April, 2018** and causing it to be electronically served to all parties of record;

and to the Creditor, **55 EAST WASHINGTON DEVELOPMENT LLC**, an Illinois limited liability company, courtesy of its Registered Agent, LP Agents LLC, at 2 North LaSalle Street, Suite 1300 in Chicago, Illinois 60602-3709:

 X **Via Certified U.S. Mail**, by depositing the same in the U.S. Mail, postage prepaid, tracking number **9414 8108 9876 5009 9010 58**, in a properly addressed, sealed and secure envelope, return receipt requested, signature requested, at 14 North Peoria Street, Suite 2-C, Chicago, Illinois 60607, before 4:00 P.M. on the **23rd day of April, 2018**.

Dated: April 23, 2018

/s/ Allen R. Perl

Allen R. Perl, ARDC No.: 6191920

Vlad V. Chirica, ARDC No.: 6320436

PERL & GOODSNYDER, LTD.

Attorneys for 55 East Washington Development LLC

14 North Peoria Street, Suite 2C

Chicago, Illinois 60607

(312) 243-4500

aperl@perlandgoodsnyder.com

vchirica@perlandgoodsnyder.com

SERVICE LIST

To:

Mark F. Becker

Becker & Becker
2300 Barrington Ste 400
Hoffman Estates, IL 60195
847 438-0678
847 382-9567 (fax)
beclaw@att.net
Assigned: 05/03/2017

representing

Chicago hotel partners , llc.

111 NE 1st Street
Miami, FL 33132
786-368-3733
305-675-9221 (fax)
brian.scheinblum@gmail.com
(Creditor)

Christopher R Belmonte

Satterlee Stephens LLP
230 Park Avenue
New York, NY 10169
(212) 818-9200
Assigned: 04/05/2017
LEAD ATTORNEY

representing

PD Lender, LLC PD Lender, LLC
(Other Prof.)

Ira Bodenstein

Shaw, Fishman, Glantz & Towbin
LLC
321 N. Clark Street
Suite 800
Chicago, IL 60610
312 666-2861
312 275-0556 (fax)
ibodenstein@shawfishman.com
Assigned: 06/23/2017

representing

Toni Sweets Chicago LLC
(Interested Party)

Matthew R Bowman

Kluever & Platt LLC
65 E. Wacker Pl., Ste 2300
Chicago, IL 60601
(312) - 2360077
rbowman@kandpllc.com
Assigned: 04/04/2017

representing

PD Lender, LLC PD Lender, LLC
(Other Prof.)

Vlad V. Chirica

Perl & Goodsnyder, Ltd.
14 North Peoria Street, Suite 2C
Chicago, IL 60607
(312) 243-4500
vchirica@perlgoodsnyder.com
Assigned: 04/05/2017

representing

**55 East Washington Development
LLC**
(Creditor)

John J Conway

Sullivan, Hincks & Conway
122 W 22nd Street Suite 100
Oak Brook, IL 60523
630 573-5021
630 573-5130 (fax)
johnconway@shlawfirm.com
Assigned: 04/05/2017

representing

Anchor Mechanical, Inc.

Sullivan Hincks & Conway
120 W. 22nd Street
Suite 100
Oak Brook, IL 60523
6305735021
6305735130 (fax)
johnconway@shlawfirm.com
(Creditor)

David R Doyle

Shaw Fishman Glantz & Towbin LLC
321 N. Clark St., Ste. 800
Chicago, IL 60654
312-541-0151
ddoyle@shawfishman.com
Assigned: 06/23/2017

representing

Toni Sweets Chicago LLC
(Interested Party)

William J Factor

The Law Office of William J. Factor,
Ltd
1363 Shermer Road
Suite 224
Northbrook, IL 60062
847-239-7248
847-574-8233 (fax)
wfactor@wfactorlaw.com
Assigned: 03/26/2017

representing

Pittsfield Development, LLC
55 East Washington St.
3rd Floor
Chicago, IL 60602
(Debtor 1)

William J Factor

Factor Law
105 W Madison St Ste 1500
Chicago, IL 60602
Assigned: 04/26/2017
LEAD ATTORNEY

representing

Pittsfield Development, LLC
55 East Washington St.
3rd Floor
Chicago, IL 60602
(Debtor 1)

FactorLaw

Assigned: 04/26/2017
LEAD ATTORNEY

representing

Pittsfield Development, LLC
55 East Washington St.
3rd Floor
Chicago, IL 60602
(Debtor 1)

Jay R Goldberg

Field And Goldberg LLC
10 S LaSalle St Ste 2910
Chicago, IL 60603
(312) 408-7200
jgoldberg@fieldandgoldberg.com
Assigned: 05/10/2017

representing

Pioneer Acquisitions LLC
(Interested Party)

Thomas H Griseta

FactorLaw
105 W. Madison Street, Suite 1500
Chicago, IL 60602
(312) - 6292031 Ext.
tgriseta@wfactorlaw.com
Assigned: 05/19/2017

representing

Pittsfield Development, LLC
55 East Washington St.
3rd Floor
Chicago, IL 60602
(Debtor 1)

Allen J Guon

Shaw Fishman Glantz & Towbin LLC
321 N. Clark St., Suite 800
Chicago, IL 60610
312- 541-0151
(312) 980-3888 (fax)
aguon@shawfishman.com
Assigned: 06/23/2017

representing

Toni Sweets Chicago LLC
(Interested Party)

David Paul Holtkamp

City of Chicago Department of Law
121 N. LaSalle St.
Ste. 400
Chicago, IL 60602
312-744-6967
David.Holtkamp2@cityofchicago.org
Assigned: 04/25/2017

representing

**City of Chicago, an Illinois
Municipal Corporation**
(Creditor)

Gregory J Jordan

Jordan & Zito LLC
55 West Monroe St., Suite 3600
Chicago, IL 60603
(312) 854-7181
312-276-9285 (fax)
gjordan@jz-llc.com
Assigned: 04/04/2017

representing

Gary Wegman
(Creditor)

Melissa J Lettiere

Stahl Cowen Crowley Addis LLC
55 West Monroe
Chicago, IL 60603
(312) - 3777888
mlettieri@stahlcowen.com
Assigned: 04/20/2017

Representing

Valerio Dewalt Train Associates
(Creditor)

Christopher L Muniz

Scalambrino & Arnoff, LLP
105 West Madison Street
Suite 1600
Chicago, IL 60602
312-629-0545
clm@sacounsel.com
Assigned: 06/26/2017

representing **Pittsfield Cafe, Ltd.**
(Interested Party)

Jeffrey K. Paulsen

The Law Office of William J. Factor,
Ltd
105 W. Madison, Suite 1500
Chicago, IL 60602
(312) 878-0969
jpaullen@wfactorlaw.com
Assigned: 04/03/2017

representing **Pittsfield Development, LLC**
55 East Washington St.
3rd Floor
Chicago, IL 60602
(Debtor 1)

Bruce C Scalambrino

Scalambrino & Arnoff, LLP
105 West Madison Street
Suite 1600
Chicago, IL 60602
312-629-0545
bcs@sacounsel.com
Assigned: 06/26/2017

representing **Pittsfield Cafe, Ltd.**
(Interested Party)

Jean Soh

Polsinelli PC
150 N. Riverside Plaza
Ste 3000
Chicago, IL 60606
312 873-3628
312-873-2928 (fax)
jsoh@polsinelli.com
Assigned: 04/17/2017

representing **Akara Partners, LLC**
(Interested Party)

John D. Spina

Spina McGuire & Okal PC
7610 West North Avenue
Elmwood Park, IL 60707
708 453-2800
708 452-5088 (fax)
jspina@smolaw.com
Assigned: 06/21/2017

Representing **Pittsfield Cafe, Inc.**
(Creditor)

Michael M Tannen
Tannen Law Group PC
19 S La Salle Street Suite 1600
Chicago, IL 60603
312 641-6650
312 641-6656 (fax)
mtannen@tannenlaw.com
Assigned: 04/25/2017

representing

Nebraska Alliance Realty Company
Tannen Law Group PC
19 S. LaSalle Street
Suite 1600
Chicago, IL 60603
312-641-6650
312-641-6656 (fax)
mtannen@tannenlaw.com
(Creditor)

Christopher A Ward
Polsinelli PC
222 Delaware Ave
Suite 1101
Wilmington, DE 19801
302-252-0920
Assigned: 05/03/2017
LEAD ATTORNEY

representing

Akara Partners, LLC
(Interested Party)

Mark R Zito
Jordan & Zito LLC
915 N. Fairfield Ave.
Chicago, IL 60622
773-295-0889
mzito@jz-llc.com
Assigned: 04/04/2017

representing

Gary Wegman
(Creditor)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No.:	17-09513
)		
Pittsfield Development LLC,)	Chapter:	11
)		
Debtor.)	Honorable Judge Jacqueline P. Cox	

MOTION TO WITHDRAW AS COUNSEL

NOW COMES the attorneys and the law firm of PERL & GOODSNYDER, LTD. (hereinafter collectively referred to as “Creditor’s Counsel”), and respectfully move this Honorable Court pursuant to Local Rule 2091-1 for leave of court to withdraw their appearance filed on behalf of Creditor, 55 EAST WASHINGTON DEVELOPMENT LLC (hereinafter referred to as the “**55 EAST**”), in the bankruptcy case *sub judice*. In support thereof, Creditor’s Counsel states as follows:

1. On April 5, 2017, Creditor’s Counsel, by its attorneys Allen R. Perl and Vlad V. Chirica, filed appearances in this case on behalf of **55 EAST**. See [Dkt. 14][Dkt. 15]
2. Since appearing in the case at bar, Defendants’ Counsel acted diligently to protect the interests of **55 EAST** in this case and/or attempt to resolve the disputes with the Debtor.
3. Since the time Creditor’s Counsel initially filed their Appearances, a potential conflict of interest may have arisen which may preclude Creditor’s Counsel from representing **55 EAST** in this matter further.
4. Although **55 EAST** has not been prejudiced as the potential conflict has only recently arisen, Creditor’s Counsel wishes to withdraw in order to avoid any potential conflict.
5. Creditor, 55 EAST WASHINGTON DEVELOPMENT LLC’s last known address is 5500 West Howard Street in Skokie, Illinois 60077.
6. Creditor was served a copy of this motion and a notice of motion, in accordance with Local Rule 2091-1

WHEREFORE, the attorneys and the law firm of PERL & GOODSNYDER, LTD. (heretofore referred to as “Creditor’s Counsel”), respectfully requests that this Honorable Court enter an order granting their Motion to Withdraw as Counsel for Defendants, 55 EAST WASHINGTON DEVELOPMENT LLC, an Illinois limited liability company, grant Creditor, **55 EAST**, twenty-one (21) days from the entry of an order granting Creditor’s Counsel leave to withdraw to find replacement counsel and stay all pending matters herein until such time that **55 EAST** has obtained substitute counsel to appear on **55 EAST**’s behalf, and for such further and other relief as this Court deems just and equitable.

Dated: April 23, 2018

/s/ Allen R. Perl

Allen R. Perl, ARDC No.: 6191920

Vlad V. Chirica, ARDC No.: 6320436

PERL & GOODSNYDER, LTD.

Attorneys for 55 East Washington Development LLC

14 North Peoria Street, Suite 2C

Chicago, Illinois 60607

(312) 243-4500

aperl@perlandgoodsnyder.com

vchirica@perlandgoodsnyder.com